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 15 GOOGLE LLC

16 UNITED STATES DISTRICT COURT
 17 NORTHERN DISTRICT OF CALIFORNIA
 18 SAN FRANCISCO DIVISION

19
 20 ANIBAL RODRIGUEZ, et al. individually and
 on behalf of all others similarly situated,

21 Plaintiffs,

22 v.

23 GOOGLE LLC,

24 Defendant.

Case No. 3:20-CV-04688-RS

DECLARATION OF THILINI CHANDRASEKERA IN SUPPORT OF GOOGLE LLC'S OBJECTIONS TO PLAINTIFFS' OPENING DEMONSTRATIVES REGARDING DAMAGES; GOOGLE'S RELATED MOTION IN LIMINE NO. 15 TO EXCLUDE EVIDENCE OF UNTIMELY ALTERNATIVE UNJUST ENRICHMENT CALCULATIONS

25 Dept: 3, 17th Fl.
 26 Judge: Hon. Richard Seeborg

27 Date Action Filed: July 14, 2020
 Trial Date: August 18, 2025

**DECL. OF CHANDRASEKERA ISO GOOGLE'S OBJS TO PLFS' OPENING DEMONSTRATIVES; RELATED MIL NO. 15
3:20-CV-04688-RS**

1 I, Thilini Chandrasekera, hereby declare as follows:

2 1. I am an associate with the law firm Cooley LLP and am counsel for Defendant
 3 Google LLC in the above captioned action. I am duly licensed to practice law in the state of
 4 California and am admitted to practice before this Court. The matters set forth herein are of my
 5 own personal knowledge, and if called as a witness to testify, I could and would testify to these
 6 matters. I submit this declaration in support of Google's Objections to Plaintiffs' Opening
 7 Demonstratives Regarding Damages; Related Motion *in Limine* No. 15 to Exclude Evidence of
 8 Untimely Alternative Unjust Enrichment Calculations, filed concurrently herewith.

9 2. On April 25, 2025, Mr. Lasinski served a second supplemental expert report
 10 omitting his new model for actual damages. Attached hereto as **Exhibit A** is a true and correct of
 11 the report and excerpts of the accompanying supplemental schedules attached to the report.

12 3. Attached hereto as **Exhibit B** is a true and correct copy of excerpts from the
 13 transcript of the pretrial conference held in this action on July 30, 2025.

14 4. Between August 1, 2025, and August 16, 2025, the parties engaged in extensive and
 15 detailed back-and-forth over Mr. Lasinski's new opinion in his second supplemental report and
 16 Plaintiffs' argument that Dr. Knittel had disclosed impermissible opinions in a supplemental report,
 17 too. As of August 4, 2025, the parties had each agreed to the same three compromise points,
 18 including that "Lasinski will not testify that damages/unjust enrichment should be the figures
 19 identified in SS1.1-II." These negotiations ultimately fell apart, and Plaintiffs now refuse to
 20 withdraw Mr. Lasinski's newly disclosed footnote damages calculation. Attached hereto as
 21 **Exhibit C** is a true and correct copy of the parties' meet and confer communications.

22 5. On August 17, 2025, the parties exchanged demonstratives for their opening
 23 presentations. Attached hereto as **Exhibit D** is a true and correct copy of excerpts of Plaintiffs'
 24 demonstratives.

25 I declare under penalty of perjury under the laws of the State of California and the United
 26 States of America that the forgoing is true and correct.

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1 Executed on August 17, 2025 at San Francisco, California.
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/s/ Thilini Chandrasekera
Thilini Chandrasekera